

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CAMERON HUBBARD,

Defendant.

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Cause No. 4:20-CR-00447-AGF/PLC

SENTENCING MEMORANDUM

I. CHARGES

On July 29, 2021, Mr. Cameron Hubbard pled guilty to a one count Indictment. Count 1 charged Bank Larceny, in violation of 18 U.S.C. § 2113(b).

II. BACKGROUND

Cameron Eugene Hubbard was born on September 18, 1999, in St. Louis, Missouri to the union of [REDACTED] and [REDACTED]. Cameron has one sibling, [REDACTED]. [REDACTED] suffers from a plethora of health issues, including but not limited to, [REDACTED]. [REDACTED]. Cameron's parents separated in 2016 and he was primarily raised by his mother and grandmother.

III. ABUSE

Cameron indicated that from ages 6 to 17, that [REDACTED] was [REDACTED] because his [REDACTED] that Cameron was [REDACTED]. Cameron also indicated that his [REDACTED] was [REDACTED] toward him from ages 16 to present because of [REDACTED]. Cameron [REDACTED] and his mother would make comments indicating that Cameron would become [REDACTED]. Additional [REDACTED] occurred when Cameron's [REDACTED] advised, [REDACTED].

Cameron also [REDACTED] while [REDACTED]. He was frequently [REDACTED] [REDACTED] and due to [REDACTED].

IV. DOMESTIC VIOLENCE

Unfortunately, during his childhood, Cameron often [REDACTED] between [REDACTED]. Cameron advised that finances and his brother's medical issues were a significant source of stress between his parents. Cameron recalls an occasion when [REDACTED] to his home because [REDACTED].

V. MENTAL AND EMOTIONAL HEALTH

Being a victim of both [REDACTED] for years has had a devastating impact on Cameron. On several occasions Cameron [REDACTED]. On these occasions Cameron felt as if [REDACTED]. Cameron advised that prior to one [REDACTED], [REDACTED] in front of a friend and said that Cameron was [REDACTED]. Cameron further advised that he [REDACTED]. Per said Presentence Investigation Report, Cameron would benefit from mental health treatment. Cameron has also reported other [REDACTED]. Additionally, Cameron reported he experienced a lot of fear and anxiety over his mother, brother and grandmother's medical issues, stating he often feared things such as their life expectancy and what would happen to each of them.

VI. SUBSTANCE ABUSE

Mr. Hubbard initially [REDACTED] when he was 16 years old [REDACTED] when he was 17 years old. Mr. Hubbard advised that he [REDACTED] on a regular until the time of his arrest in the instant case. He acknowledged that he [REDACTED] 2-3 times a week until the time of his arrest in the instant case.

VII. EDUCATIONAL AND CAREER OBJECTIVE

Cameron Eugene Hubbard is a young person who has tremendous potential. In 2018, he received his high school diploma from Soldan International Studies High School. Currently he is a student at St. Louis Community College. Additionally, he is employed at Charter Spectrum Communications as a Sales Representative. Mr. Hubbard utilizes employment income to finance his college education. Cameron has goals of becoming a real estate investor and owning other businesses.

VIII. SENTENCING RECOMMENDATION

Per paragraph 76 of said Presentence Investigation Report, Mr. Hubbard is eligible for probation. Since the applicable guideline range is in Zone A of the Sentencing Table, a sentence of

imprisonment is not required. There are several factors under 18 U.S.C. § 3553(a) that the court may want to consider when determining an appropriate sentence: the defendant is 22 years old, [REDACTED], is facing his first term of incarceration. He is educationally prepared and currently employed. Lastly, Mr. Hubbard is willing and able to pay restitution. The Defense respectfully request that Mr. Hubbard be sentenced to a term of probation.

Respectfully submitted:

RUDMAN & SMITH, LLC

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